

DISTRICT ATTORNEY KINGS COUNTY

350 JAY STREET BROOKLYN, NY 11201-2908 (718) 250-2000 WWW.BROOKLYNDA.ORG

> [INSERT NAME] Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]

Kings County Dkt./Ind. No. [#######]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: RICHARD CHARLES

MOS TAX:

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move <u>in limine</u> to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

MOS IS A NAMED DEFENDANT IN THE FOLLOWING CIVIL ACTIONS:

- FITZGERALD BROWN V. CITY OF NY, ET AL, 13-CV-04946, FILED IN THE EASTERN DISTRICT OF NEW YORK
- OMAR RENDON V. CITY OF NY, ET AL, 008588/2015, FILED IN QUEENS COUNTY SUPREME COURT

Disclosure # 2:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION ARISING FROM AN INCIDENT ON OR ABOUT 11/21/2015:

 MOS VIOLATED PATROL GUIDE PROCEDURE 219-14, PAGE 1, PARA. 2, IN THAT MOS UTILIZED A DEPARTMENT COMPUTER TO ACCESS RECORDS AND DATABASES FOR NON-DEPARTMENTAL PURPOSES.

ACTION TAKEN: MOS FORFEITED TWO (2) VACATION DAYS.

Disclosure #3 (PENDING):

NYPD HAS THE FOLLOWING INTERNAL INVESTIGATION DATED 12/26/2019 PENDING



IN ADDITION, BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER:

Disclosure #4:

CCRB No. 201112369 Report Date: 09/23/2011

Disclosure # 5:

CCRB No. 201507881 Report Date: 09/17/2015

Disclosure #6:

CCRB No. 201901085 Report Date: 02/06/2019 Incident Date: 12/22/2018

CCRB SUBSTANTIATED ALLEGATIONS:

- 1. Force Physical force
- 2. Abuse Stop

NYPD Disposition and Penalty: Command Discipline B OTHER MISCONDUCT NOTED (NO CCRB JURISDICTION):

- OMN - Failure to prepare a memo book entry

Disclosure #7:

CCRB No. 201901453 Report Date: 02/16/2019 Incident Date: 02/16/2019

SUBSTANTIATED CCRB ALLEGATIONS:

- 1. Abuse Failure to provide RTKA card
- 2. Abuse Failure to provide RTKA card NYPD ACTION: INSTRUCTIONS

OTHER MISCONDUCT NOTED (NO CCRB JURISDICTION):

- 1. OMN Failure to prepare a memo book entry
- 2. OMN Failure to produce stop and frisk report

Disclosure #8:

CCRB No. 201902971 Report Date: 04/05/2019 Incident Date: 03/29/2019

SUBSTANTIATED CCRB ALLEGATIONS:

1. Abuse - Failure to provide RTKA card

OTHER MISCONDUCT NOTED (NO CCRB JURISDICTION):

OMN - Other Misconduct